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Proposed Co-Lead Counsel for Movant Arman Anvari and the Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BRUCE MACDONALD, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN,
an Individual, ARTHUR BREITMAN,

Case No. 3:17-cv-07095-RS

**DECLARATION OF JAMES M. LEE IN
SUPPORT OF THE MOTION OF
ARMAN ANVARI FOR APPOINTMENT
AS LEAD PLAINTIFF AND APPROVAL
OF COUNSEL**

CLASS ACTION

1 an Individual, TIMOTHY COOK DRAPER, an
2 individual, DRAPER ASSOCIATES, JOHANN
3 GEVERS, DIEGO PONZ, GUIDO SCHMITZ-
4 KRUMMACHER, BITCOIN SUISSE AG,
NIKLAS NIKOLAJSEN, and DOES 1-100,
INCLUSIVE,

5 Defendants.

Judge: Hon. Richard Seeborg
Courtroom: 3, 17TH Floor

1 I, James M. Lee, hereby declare as follows:

2 1. I am a founding Partner of the law firm LTL Attorneys LLP (“LTL”), counsel on behalf
3 of Arman Anvari (“Anvari” or “Movant”). I make this Declaration in support of the motion by
4 Movant for appointment as Lead Plaintiff and for approval of its selection of Hung G. Ta, Esq. PLLC
5 as Co-Lead Counsel for the Class.

6 2. Attached as Exhibits A through E are true and correct copies of the following documents:

7 Exhibit A: Notice of pendency of a class action published over *Global Newswire* in the
8 above-captioned action on November 29, 2017.

9 Exhibit B: PSLRA Certification by Movant in the above-captioned action.

10 Exhibit C: Value of Ethereum, obtained on January 25, 2018 from coinmarketcap.com.

11 Exhibit D: Firm resume for LTL Attorneys LLP

12 Exhibit E: Firm resume for Hung G. Ta, Esq., PLLC

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct to the best of my knowledge. Executed this 25th day of January, 2018
15 at Los Angeles, California.

16 s/James M. Lee

17 James M. Lee